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Exhibit 6

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

IN RE: CHANTIX (VARENICLINE) PRODUCTS LIABILITY LITIGATION Master File No.: 2:09-CV-2039-IPJ

MDL No. 2092

This Document Relates To:

ALL CASES

DOCUMENT PRODUCTION PROTOCOL (EXHIBIT 6 TO PRETRIAL ORDER NO. 4)

This Document Production Protocol ("Protocol") shall apply to all cases transferred to this Court by the Judicial Panel on Multidistrict Litigation ("Panel") pursuant to its order of October 1, 2009, any tag-along actions transferred to this Court by the Panel, and any related actions that have been or will be originally filed in, transferred to, or removed to this Court and assigned thereto as part of *In re: Chantix (Varenicline) Products Liability Litigation*, MDL No. 2092 ("the MDL proceedings"). This Protocol also may apply to state court actions provided that the parties thereto so agree or the applicable court so orders. This Protocol shall apply to the production of hard-copy and electronic documents by Pfizer Inc and its agents, employees (current and former), representatives, subsidiaries, and other affiliated entities (collectively, "Pfizer").

1. Document Images.

a. <u>Document Images Generally</u>. All documents that originally existed in either hard-copy or native electronic form that are not privileged or otherwise protected from production and are responsive to discovery requests or Court order (or are otherwise produced in these proceedings) shall be produced in electronic image form in

the manner provided herein, except where otherwise indicated. Each document's electronic image shall convey the same information and image as the original document. The parties shall meet and confer promptly to address any documents that present imaging or formatting problems to attempt to resolve any such problems.

- b. <u>Image Format</u>. All production document images will be provided as single-page "TIFFs" utilizing Group 4 compression. All images generated from hard-copy documents shall be scanned as single page black and white images at 300 d.p.i. resolution. All native electronic documents shall reflect how the source document would have appeared if printed out to a printer attached to a computer.
- c. <u>Color Images</u>. Where the Plaintiffs' Steering Committee ("PSC") wishes to obtain color images of a document that contains color, the parties shall meet and confer regarding the production of color images for such documents and the format for such production. Pfizer shall honor reasonable and specific requests for the production of color image(s) of such documents.
 - 2. <u>Information Accompanying Document Images.</u>
- a. <u>Load Files</u>. Pfizer shall provide documents with a Concordance delimited file and an Opticon delimited file. Examples of such files are listed below:

Example of Option Delimited File:

MSC000001,MSC001,D:\IMAGES\001\MSC000001.TIF,Y,,,3 MSC000002,MSC001,D:\IMAGES\001\MSC000002.TIF,Y,,,, MSC000003,MSC001,D:\IMAGES\001\MSC000003.TIF,Y,,,, MSC000004,MSC001,D:\IMAGES\001\MSC000004.TIF,Y,,,,2 MSC000005,MSC001,D:\IMAGES\001\MSC000005.TIF,Y,,,,

Example of Concordance Delimited File:

bBegDocb_bEndDocb_bBegAttachb_bEndAttachb_bCustodianb

- b. <u>Document Unitization</u>. Each page of a hard copy document shall be scanned or electronically saved into an image. If a document is more than one page, the unitization of the document and any attachments and/or affixed notes shall be maintained as it is kept in the ordinary course of business. Distinct documents should not be merged into a single record, and single documents should not be split into multiple records. The parties will make their best efforts to have their vendors unitize documents correctly and will commit to address situations where there are improperly unitized documents.
- c. <u>File Naming Conventions</u>. Each page image file shall be named with the unique Bates Number of the page of the document in the case of single-page TIFFs, followed by the extension "TIF." In the event the Bates Number contains a symbol and/or character that cannot be included in a file name, the symbol and/or character will be omitted from the file name.
- d. <u>Production Media.</u> Pfizer shall produce documents on CD-ROM, DVD, external hard drive (with standard PC compatible interface formatted using NTFS with a firewire and/or USB 2.0 interface), or such other readily accessible computer or electronic media as the parties agree upon ("the Production Media"). Each piece of Production Media shall identify a production number corresponding to the production "wave" with which the documents on the Production Media are associated (*e.g.*, "Pfizer-CX 001," "Pfizer-CX 002"), as well as the volume of the material in that production wave (*e.g.*, "-001," "-002"). For example, if the first production wave by Pfizer comprises document images on three hard drives, Pfizer shall label each hard drive in the following manner: "Pfizer-CX 001-001," "Pfizer-CX 001-002," and "Pfizer-CX 001-0101."

003." The Production Media also shall bear a label indicating: (1) that it was produced in MDL No. 2092, (2) the producing party's name, (3) the production date (including the day, month, and year that the production was created on the disk or hard drive), (4) where practicable, the type of materials on the media (*e.g.*, "Images," "OCR text," or "load files"), and (5) where practicable, the Bates Number range of the materials contained on the Production Media. If any such information cannot be placed on the label on the Production Media, it shall be provided in an accompanying letter. Should any single "wave" produced by Pfizer exceed five (5) DVDs, the production shall be made by hard drive, which will be supplied and/or paid for by the PSC.

e. Objective Coding. If either party objectively codes the documents Pfizer produces in this litigation, that party shall produce with each production of documents (or upon creation of such coding) an ASCII text file, appropriately delimited, setting forth the objective coding for each document (the "Objective Coding"). The datafile shall include the fields and type of content set forth in Exhibit A to this Order, if available. If Pfizer produces the Objective Coding, the Objective Coding shall be labeled and produced on Production Media in accordance with the provisions stated herein. If the PSC has problems importing and using the Objective Coding for document management, the parties shall meet and confer to attempt to resolve the problems.

Neither party's production of Objective Coding shall constitute any certification as to the reliability, accuracy or completeness of the coding, nor shall it constitute any waiver of work product protection or the attorney-client privilege with respect to that coding.

- 3. Text Files Accompanying Document Images.
- a. <u>Unredacted Electronic Text Files</u>. For documents that exist natively in electronic format that Pfizer has <u>not</u> redacted in any part and that Pfizer produces as images, Pfizer shall produce extracted text files reflecting the full text that has been electronically extracted from the original, native electronic files ("Extracted Text").
- b. Redacted Electronic Text Files and Text Files Accompanying

 Hard-Copy Documents. For documents that exist natively in electronic format that Pfizer

 has redacted in any part or for hard-copy documents, Pfizer shall produce corresponding

 Optical Character Recognition ("OCR") text files ("OCR Text").
- c. Format of Production of Extracted Text or OCR Text. The

 Extracted Text and/or OCR Text (collectively, "the Text Files") shall be provided in

 ASCII text format and shall be labeled and produced on Production Media. The Text

 Files will be named with the unique Bates Number of the first page of the corresponding document followed by the extension ".TXT".
- d. <u>No Certification as to Text Files</u>. Pfizer's production of the Text Files shall not constitute any certification as to the reliability, accuracy or completeness of the Extracted Text or the OCR Text.
- e. <u>Meta-Data</u>. For images generated from native electronic documents, Pfizer shall produce meta-data corresponding to the fields in Exhibit A to this Protocol, where available.
- 4. <u>Original Documents</u>. Pfizer shall retain the original hard-copy and native electronic source documents for all documents produced in this MDL proceeding. Pfizer

shall make reasonable efforts to maintain the original native electronic source documents in a manner so as to preserve the "meta-data" associated with these electronic materials. Subject to preservation of appropriate privileges and other protections of Pfizer's information from production in accordance with applicable law, Pfizer shall, upon reasonable request, make originals of any produced document available for inspection by the requesting party in the form in which such documents are kept in the ordinary course of business.

- 5. <u>Databases</u>. Where Pfizer is producing a database, it shall provide the PSC with the data contained in the database in a fully searchable format which mirrors the fields of the original database to the extent possible using SQL. Contemporaneously with the production, Pfizer will provide to the PSC a description of the fields in each database, where available. The parties will meet and confer regarding which, if any, fields Pfizer claims are protected or privileged and should be withheld from production if such fields are not already addressed by the protective order in this litigation.
- 6. <u>Searches to Identify Discoverable Materials</u>. The parties will meet and confer regarding the individuals, databases, and locations (collectively "sources") which have been and will be searched for potentially discoverable materials. The parties also will confer regarding the method which Pfizer has and shall use in searching those sources, including the use of an agreed set of search terms. Should the PSC identify additional sources or request additional searches, the parties shall meet and confer regarding such sources and searches before seeking relief from the Court.
- 7. <u>Use of Documents</u>. When documents produced in accordance with this Protocol are used in any proceeding, including depositions, hearings, or trial, the image

copy of the document shall be the copy used. OCR or extracted text shall not be used in any proceeding as a substitute for the image of any document.

Exhibit A

Coding Field	Description
BegBates; EndBates	The beginning and ending Bates numbers for the document at issue.
BegAttach; EndAttach	The beginning and ending Bates numbers of the collection to which the document and any attachments thereto are associated (<i>i.e.</i> , for an email that is bates stamped ABC0001 – ABC0002, with two attachments bates stamped ABC0003 – ABC0004 and ABC0005 – ABC0008, the BegAttach and EndAttach for all three documents would be ABC0001 – ABC0008).
DocDate	The date of the document, formatted as follows: MM/DD/YYYY, with leading zeros as appropriate (<i>e.g.</i> , 01/01/2010). For emails, the field will reflect the date the email was sent; for other documents, the field will reflect the last date on which the document was saved.
DocType	The type of document (<i>e.g.</i> , email, Microsoft Word 2000, Microsoft Excel, etc.).
Document Title	The title of the document, if any, including any meta-data title field of the native file.
AuthorName	The author(s) of a document, including the display name or author field value, pulled from the meta-data of an ESI document.
То	The addressed recipient(s) of a document.
CC	The addressed recipient(s) of copies of a document.
BCC	The addressed recipient(s) of blind copies of a document.
Subject	Subject of an email message or on the face of the document.
DocID	The unique number of a document assigned by a document management system, if available with the extracted meta-data.
Comments	The comments embedded in the document, if available with the extracted meta-data and it is technologically feasible to include with the meta-data load file.
Attachment List	Document names of responsive and non-privileged attachments to emails or other documents, if available with the extracted meta-data and it is technologically feasible to include with the meta-data load file.
Custodian	The name of the individual whose electronic or hardcopy custodial file contained the document at issue.
Importance	For Outlook emails, "High," "Low," or "Normal."

Coding Field	<u>Description</u>
Sensitivity	For Outlook emails, "Normal," "Private," "Personal," or "Confidential."
Marginalia	For hard-copy documents, yes or no indication of whether the document at issue contains handwritten notations, notes, or marginalia.
Redacted	Yes or no indication of whether the document at issue is redacted.
Confidential	Yes or no indication of whether the document at issue was designated as confidential or highly confidential as of the date of production.
MD5 Hash code	Unique identifier, extracted from all files; the Hash value or "de-duplication key" assigned to a document.